

**CALFED
BAY-DELTA
PROGRAM**

1416 Ninth Street, Suite 1155
Sacramento, California 95814

(916) 657-2666
FAX (916) 654-9780

January 9, 1998

Byron M. Buck, Executive Director
California Urban Water Agencies
455 Capitol Mall, Suite 705
Sacramento, CA 95814

Dear Byron:

Thank you for your November 24, 1997 letter expressing concern over the manner by which CALFED intends to characterize its water quality targets for bromide and Total Organic Carbon. In response to your request for a workshop to discuss this matter, a meeting was convened on December 3, 1997 that included yourself, technical representatives of CUWA agencies, the Departments of Health Services and Water Resources, U.S. Environmental Protection Agency, CALFED, and others. It is my understanding that this meeting resulted in essential agreement on the approach to be taken.

CALFED water quality targets for ecosystem, agricultural, municipal and industrial beneficial uses have generally been set at levels that represent "thresholds" below which no significant impairment of beneficial uses is expected. These ambitious targets are intended to direct CALFED resources toward attainment of the best possible water quality consistent with other Program objectives, recognizing that full attainment may not be possible in all cases. Therefore, we believe it is consistent with this philosophy to establish a bromide target that enables production of safe drinking water from the Delta, at reasonable cost.

The draft bromide target level of 50 ug/L, published in the August 1997 Draft Water Quality Program Component Report received criticism in that it was perceived as inappropriately forecasting promulgation of stringent new drinking water standards. Recognizing the course of future drinking water regulations is not clear, reviewers felt that depiction of a range of bromide concentrations would be a more accurate way to describe alternative regulatory futures.

As a result of the December 3 meeting, we understand the agreement is to depict a bromide target range of 50 ug/L to 200 ug/L, and that we will use this range to provide a sensitivity analysis of the consequences that might be associated with different regulatory

CALFED Agencies

California The Resources Agency
 Department of Fish and Game
 Department of Water Resources
 California Environmental Protection Agency
 State Water Resources Control Board

Federal Environmental Protection Agency
 Department of the Interior
 Fish and Wildlife Service
 Bureau of Reclamation
 U.S. Army Corps of Engineers

Department of Agriculture
Natural Resources Conservation Service
Department of Commerce
National Marine Fisheries Service

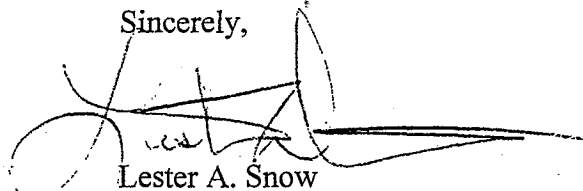
Byron Buck
January 9, 1998
Page Two

futures. As CUWA has the technical capability to assist in performance of the necessary analyses, it is our understanding that your staff have agreed to prepare a draft analytical protocol that will be reviewed and agreed upon by the other parties, then adopted by CALFED. It is also our understanding that CUWA may volunteer technical assistance in performance of the needed work.

The water quality target for Total Organic Carbon, currently set at 3 mg/L did not receive a great deal of discussion at the December 3 meeting; accordingly our intention will be to leave it unchanged. We believe this is a reasonable objective inasmuch as the TOC concentration in the lower Sacramento River averages about 2 mg/L and the TOC of South Delta export waters averages about 4 mg/L. Our estimates indicate that about 3 mg/L is about the best that can be expected of the Delta alternatives as currently configured. While important, we believe organic carbon concentrations are less significant to the decision process than is bromide, because source control and treatment options exist for organic carbon, irrespective of which Delta alternative is selected.

As attachments, I have included a copy of the minutes of the December 3, 1997 meeting and prior correspondence from the U.S. Environmental Protection Agency which was requested at the meeting.

Sincerely,



Lester A. Snow
Executive Director

Attachments